

Exhibit F

Hofman, Herman D.

From: Clayman, John <JClayman@fdlaw.com>
Sent: Tuesday, February 22, 2022 3:04 PM
To: Hofman, Herman D.
Cc: Caywood, Candace; Simms, Amber; Kevin Majewski; Clayman, John
Subject: BOKF/Ortiz v. Nelms (123.001) - Response to Subpoena
Attachments: 2022-02-22 Herman D. Hofman, Esq. w-Attachment.pdf

Good afternoon again, Herman (and Kevin):

Please see the attached. Thank you. Take care.

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February 22, 2022

VIA SCANNED E-MAIL ONLY

Herman D. Hofman, Esq.
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Bridgewater Place
Grand Rapids, Michigan 49501-0352

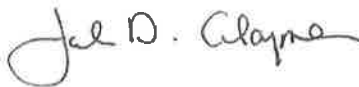
RE: ***BOKF, NA d/b/a Bank of Texas/Ortiz v. Nelms***
Civil Action No. 1:21-CV-00495
Subpoena to Bank of Texas

Dear Herman:

Thank you for your phone call today regarding the production of documents involving MGMC, LP and Q Consolidated, Inc., entities I understand that are owned or controlled by Mr. Nelms. As we discussed, in light of Kevin Majewski's e-mail from February 21, 2022 (attached), BOKF, NA d/b/a Bank of Texas is unable to produce documents given the objection of these bank customers. While I respect your legal research and analysis, Bank of Texas can't be in a position of producing documents when its customers will not consent even though no legal basis was provided.

Accordingly, Bank of Texas will require clarification from the Court on this issue. I appreciate your courtesy and cooperation. Please let me know if you have any additional questions or comments.

Sincerely,



John D. Clayman
For Frederic Dorwart, Lawyers PLLC

Enclosure

cc: BOKF, NA Contacts (via scanned e-mail only w/enclosure)
Kevin C. Majewski, Esq. (via scanned e-mail only w/enclosure)

From: [Kevin Majewski](#)
To: [Clayman, John](#)
Cc: [Caywood, Candace](#); sdenenfeld@lewisreedallen.com; [Eric Parzianello](#)
Subject: RE: BOKF/Ortiz v. Nelms (123.001) - Response to Subpoena
Date: Monday, February 21, 2022 1:40:02 PM
Attachments: [image001.png](#)

John,

Mr. Nelms will not consent to the release of the records pursuant to the subpoena. Please let me know if you have any questions or concerns. Thanks.

KEVIN C. MAJEWSKI | ATTORNEY
HUBBARD SNITCHLER & PARZIANELLO PLC
MICHIGAN OFFICE **FLORIDA OFFICE**
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801 W. ANN ARBOR TRAIL 999 VANDERBILT BEACH RD.
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START A RESOLUTION



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From: Clayman, John <JClayman@fdlaw.com>
Sent: Wednesday, February 9, 2022 10:45 AM
To: Kevin Majewski <kmajewski@hspplc.com>
Cc: Caywood, Candace <CCaywood@fdlaw.com>; sdenenfeld@lewisreedallen.com; [Eric Parzianello](#) <eparzianello@hspplc.com>; Clayman, John <JClayman@fdlaw.com>
Subject: FW: BOKF/Ortiz v. Nelms (123.001) - Response to Subpoena

You don't often get email from jclayman@fdlaw.com. [Learn why this is important](#)

Good morning Kevin:

Hope you're doing well. I'm following up our Friday afternoon phone call about the position of Mr. Nelms on the production of documents pertaining to MGMCM, LP and Q Consolidated, Inc. that had accounts with Bank of Texas. As we discussed, Herman Hofman provided me with case authority that Federal Rules of Procedure would take precedence over the Texas Right to Financial Privacy.

I look forward to hearing from you and appreciate your courtesy in this matter. Take care.

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From: Clayman, John
Sent: Wednesday, February 2, 2022 5:29 PM
To: hdhofman@varnumlaw.com
Cc: Caywood, Candace <CCaywood@fdlaw.com>; Simms, Amber <asimms@fdlaw.com>; eparzianello@hspplc.com; kmajewski@hspplc.com; sdenenfeld@lewisreedallen.com; Clayman, John <JClayman@fdlaw.com>
Subject: BOKF/Ortiz v. Nelms (123.001) - Response to Subpoena

Good evening Mr. Hofman:

Please see the attached. Thank you. Best regards.

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